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September 9, 2024

BY ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Reclaim the Records, et al. v. United States Citizenship and Immigration Services*, No. 23 Civ. 1997 (PAE)

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act. I write to respectfully request a 14-day extension of the September 13, 2024 deadline for Plaintiffs' response to Defendant's motion to dismiss, for summary judgment, or for severance. Plaintiffs will also be cross-moving for summary judgment, and respectfully request a deadline for their reply brief. Taking into consideration the Jewish holidays, election day, and Veterans Day, counsel for both sides have agreed to the following revised schedule:

	Original due date	Proposed revised date
Plaintiffs' response to Defendant's motion	September 13, 2024	September 27, 2024
Defendant's reply	October 4, 2024	November 1, 2024
Plaintiffs' reply on cross-motion		November 22, 2024

This is the first request by Plaintiffs for an extension of the briefing schedule. Prior to the present motion and during efforts to narrow or resolve the issues in the case, the Court granted eleven extensions of Defendant's time to answer (ECF Nos. 9, 12, 14, 16, 18, 20, 22, 26, 29, 31 and 33).

I thank the court for its consideration of this request.

BELDOCK LEVINE & HOFFMAN LLP

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Respectfully submitted,

/s/ Benjamin Meyers

Benjamin Meyers

cc: Defendant's counsel (by ECF)